

From: Anisa Divine
Sent: Tuesday, February 17, 2004 7:04 PM
To: Dabbs, Paul
Cc: Lisa Beutler;

Subject: Water Transfers strategy comments

Dear Paul,

I did not get the attached statement completed in time to include in the Ag
Caucus.

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Early text in this section muddles the topics of supplier & receiver. to fix that:

1 – Separate text that describes suppliers (sellers) from that which describes receivers (purchasers). At best use separate sections, at least separate paragraphs.

2 – Clearly delineate between hydrologic regions. See page 3, including footnote 3. Do not write a section about Southern California that includes South Coast (a receiver) and Colorado River (a supplier) – unless the aspects relating to the receiver and to the supplier are clearly delineated. Ditto for the San Joaquin Valley that includes San Joaquin River and Tulare Lake hydrologic regions – unless both are either only a supplier or a receiver.

Line by line:

Page 2 – It is indicated that ag water districts were primarily responsible for supplying water throughout this period (late 1980s and early 1990s). What happened after that is not addressed.

Page 3 – “Two sectors responsible for growth ...” From what date?

Page 3 – “Agricultural districts now account for half of all purchases, and have been responsible for 2/3 of growth in transfers since 1995.” Does this mean as receiver or as both supplier & receiver? This is not clear because what happened to ag as a supplier after the early-1990s has not been made clear

Page 3 – “In most years, roughly 75% of transfers originate..., with the remainder from Southern California.” Make clear whether this is addressing supplier or purchaser; i.e., whether the amount being addressed is for supply to the South Coast or is being supplied by the Colorado River region. NOTE: This was not important until October 2004, but clarity will serve us well now.

Page 4 – end of Paragraph 1: Let the reader know that transfers of duration greater than one year require CEQA/NEPA EIR/EIS documentation.

Page 4 – Include a paragraph about the Colorado River region. Describe oversight for the IID/MWD transfer and requirements under the QSA. Both transfers required EIR/EIS documentation and SWRCB approval. The IID/SDCWA transfer involves USBR approval or permission – up to the level of the Secretary of the Interior. Also involvement by the Salton Sea Authority, etc., etc. Let the reader know that the IID program oversight is described later in this strategy.

Page 4, last paragraph, last sentence, what is an export service area?

Page 4, footnote 4 – “economic issues are typically only required to be evaluated in water transfers that seek to utilize DWR’s water conveyance facilities or those of other state or local agencies.” Please check this out, I think any transfer that requires an EIR/EIS (that is any transfer lasting more than 1 year), must include an evaluation of economic issues.

Page 5 – before last paragraph, new heading: Local Involvement

Page 7, figure 3 – The IID/MWD, IID/SDCWA and IID/CVWD water transfers are not pending.

Page 8, end of 1st paragraph – “... do not address legal and institutional barriers...” Nor, apparently, do they address conveyance barriers. I attended Southern California Water Committee meetings on the topic of Water Transfers met for about a year. The consensus was that the major obstacle to water transfers to the South Coast region is conveyance restriction. Please include this somewhere in this strategy and also in the Conveyance strategy.

Page 8, 2nd paragraph – “The direct costs...”, second sentence “and physical losses” – write what this loss is – I guess you mean conveyance seepage, evaporation and phreatophyte use. If so, write that. If not, write whatever this jargon means.

Page 11-13 Recommendations: Include a numbered recommendation that the State fulfill its obligations under the QSA – for AAC & Coachella Canal lining, for Salton Sea restoration, etc.